

October 10, 2016

VIA ECF & HAND DELIVERY

Honorable Sarah Netburn
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *Coordinated RMBS Trustee Litigation against HSBC Bank USA, N.A.*,
Nos. 14-cv-8175; 14-cv-9366; 14-cv-10101; 15-cv-02144; 15-cv-10032

Dear Judge Netburn:

In accordance with the Court's directions at the September 21, 2016 hearing and Plaintiffs' October 5, 2016 status letter, Plaintiffs in the above-referenced actions respectfully submit this joint letter to provide the Court with a further update on the status of Plaintiffs' efforts to coordinate statistical sampling expert discovery among the five cases.¹

As Plaintiffs have previously informed HSBC, Plaintiffs confirm that they will use a single statistical and sampling expert who will provide a single report. This expert has, and will, utilize a common sampling methodology for each Plaintiff's case. Specifically, Plaintiffs' expert will draw a simple random sample of 150 loans from all loans (except those loans that are paid in full without losses). For the DBALT 2006-AR5, FHLT 2005-C, and WFHET 2006-2 Trusts, Plaintiffs' expert will draw a simple random sample of 400 loans.

Plaintiffs will provide HSBC with their sample as soon as it becomes available.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Benjamin Galdston

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/s/ Christopher M. Wood

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¹ As previously discussed, the Triaxx Plaintiffs will not be sampling loans.

Honorable Sarah Netburn
October 10, 2016
Page 2

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